

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

RUBIN LUBLIN, LLC,

Petitioner.

v.

JOHN S. HULL, ALANDA C. HULL, and THE  
INTERNAL REVENUE SERVICE, AN AGENCY  
OF THE UNITED STATES OF AMERICA,

Respondents.

Case No. 3:19-cv-00218-DPJ

**RUBIN LUBLIN, LLC’S INITIAL DISCLOSURES**

Pursuant to Fed R. Civ P. 26(a)(1), Petitioner Rubin Lublin, LLC (“Rubin Lublin”), by and through the undersigned counsel, makes the following initial disclosures based on information reasonably available to Rubin Lublin as of this date. Discovery and pretrial preparation may develop further information affecting these initial disclosures. Accordingly, Rubin Lublin reserves the right to supplement the information contained herein if and as additional information becomes known to it.

**DISCLOSURES**

**Disclosure No. 1:** The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

**Response No. 1:**

A corporate representative of Rubin Lublin, LLC. Rubin Lublin can be contacted through undersigned counsel. This representative may have discoverable information related to its appointment as substitute trustee and all aspects of the subject foreclosure sale.

Any other individual identified by any Defendant in their Initial Disclosures.

**Disclosure No. 2:** A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

**Response No. 2:**

This is an action for interpleader and Rubin Lublin has no claims against any party to this action.

**Disclosure No. 3:** A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered;

**Response No. 3:**

This disclosure is not applicable to Rubin Lublin, as it is not claiming any damages at this time.

**Disclosure No. 4:** for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

**Response No. 4:**

At the present time, there is no insurance agreement under which an insurance business may be liable to satisfy all or party of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted, this 15th day of May 2019.

/s/ Amanda M. Beckett

PETER L. LUBLIN (MS BAR # 103705)

AMANDA M. BECKETT (MS BAR # 102738)

**Rubin Lublin, LLC**

3145 Avalon Ridge Place, Suite 100

Peachtree Corners, GA 30071

(770) 246-3333 (Telephone)

(404) 921-9016 (Facsimile)

plublin@rubinlublin.com

abeckett@rubinlublin.com

*Attorneys for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that I have, this 15th day of May 2019, caused a true and correct copy of the within and foregoing to be served via CM/ECF to the following:

Tabitha Bandi  
501 East Court Street, Suite 4.430  
Jackson, MS 39201

/s/ Amanda M. Beckett  
AMANDA M. BECKETT (MS Bar No. 102738)